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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

INTERNATIONAL INSTITUTE OF  
MANAGEMENT,

Plaintiff,

v.

ORGANISATION FOR ECONOMIC CO-  
OPERATION AND DEVELOPMENT  
(OECD); PROFESSOR JOSEPH STIGLITZ;  
AND JOHN DOE,

Defendants.

Case No.: 2:18-CV-01748-JCM-GWF

**STIPULATION, JOINT MOTION,  
AND PROPOSED ORDER**

**STIPULATION, JOINT MOTION, AND PROPOSED ORDER**

Pursuant to Rules IA 6-2 and 7-1 of the Local Rules of the United States District Court for  
the District of Nevada, and Rule 4 of the Federal Rules of Civil Procedure, the undersigned

1 parties have conferred by and through their counsel and, subject to the Court's approval,

2 **HEREBY STIPULATE AS FOLLOWS:**

3 *Whereas*, on September 10, 2018, the International Institute of Management ("Plaintiff")  
4 filed a complaint in the above-captioned case against the Organisation for Economic Co-operation  
5 and Development ("Defendant") and Professor Joseph Stiglitz (not a party to this stipulation);

6 *Whereas*, Defendant, an intergovernmental organization whose headquarters are located in  
7 Paris, France, has not yet been served with process;

8 *Whereas*, Plaintiff wishes to avoid the burden and expense of serving process on Defendant;

9 *Whereas*, Defendant retained outside counsel in this matter only on December 13, 2018,  
10 and desires a reasonable amount of time to respond to the complaint;

11 *Therefore*, Plaintiff and Defendant hereby agree as follows:

12 1. Defendant will voluntarily accept service of process through its outside counsel in this  
13 matter without prejudice to its immunities or other defenses;

14 2. Defendant will respond to the complaint, in the form of a motion to dismiss, on or before  
15 January 22, 2019;

16 3. This stipulation or Defendant's voluntary acceptance of service of process through  
17 outside counsel does not constitute a waiver by Defendant of any substantive or procedural  
18 defense, including but not limited to the defenses of international organizations' immunity from  
19 jurisdiction and execution, lack of personal or subject-matter jurisdiction, or improper venue.

20 4. Plaintiff hereby agrees that it will not cite, rely upon, or use in any other way this  
21 Stipulation in any litigation or proceeding other than this case.

22 **IT IS HEREBY SO STIPULATED AND AGREED.**

1 DATED this 18th day of December, 2018.

2 GIBSON, DUNN & CRUTCHER LLP BAUMAN LOEWE WITT & MAXWELL, PLLC

3 /s/ Joseph Tartakovsky

4 JOSEPH TARTAKOVSKY

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*Attorney for Defendant*

8 *Organisation for Economic Co-*  
*operation and Development*

/s/ Michael C. Mills

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mmills@blwmlawfirm.com

*Attorney for Plaintiff*

*International Institute of Management*

10 **IT IS SO ORDERED:**

11   
UNITED STATES MAGISTRATE JUDGE

12  
13 Dated: December 19, 2018.

**CERTIFICATE OF SERVICE**

I, Matthew J. Snider, certify as follows:

I am employed in the County of San Francisco, State of California. I am over the age of 18 years and am not a party to this action. My business address is 555 Mission Street, Suite 3000, San Francisco, CA 94105-0921, in said County and State. On December 18, 2018, I served the following document(s):

**NOTICE OF APPEARANCE OF COUNSEL AND NOTICE UNDER LOCAL RULE IA 1-11(B)(2)**

**STIPULATION, JOINT MOTION, AND PROPOSED ORDER**

On the persons stated below, by the following means of service:

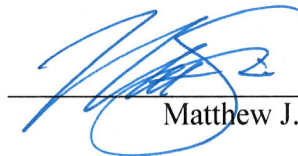
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*Attorneys for Professor Joseph Stiglitz*

The documents were served pursuant to Fed. R. Civ. P. 5(b) via the ECF electronic case filing system and via electronic mail. I caused the document to be sent to the persons at the email addresses listed above. The sending address is MSnider@gibsondunn.com.

I am employed in the office of Joseph Tartakovsky, admitted to the bar of this Court, at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration was executed on December 18, 2018, at San Francisco, California.



Matthew J. Snider